

NORTHERN NEVADA ADULT MENTAL HEALTH

POLICY AND PROCEDURE DIRECTIVE

SUBJECT: PHARMACEUTICAL COMPANY INTERACTION

NUMBER: NN-LD-13

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ORIGINAL DATE: 12/18/09, 2/18/10

REVIEW/REVISE DATE:

APPROVAL: Rosalyn Reynolds {s}, Agency Director

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I. PURPOSE :

To provide guidelines and regulations regarding interactions of clinical staff with representatives of the pharmaceutical industry.

II. POLICY :

Northern Nevada Adult Mental Health Services (NNAMHS) recognizes that the prescribing and monitoring of psychotropic medications is a major activity in the organization and that this occurs concurrently with many interactions with representatives of the pharmaceutical industry.

III. REFERENCES:

Pharmaceutical Research and Manufacturers of America: Code on Interactions with Healthcare Professionals. <http://www.phrma.org>.

#### IV. PROCEDURES

**A. For substantial on-campus activities:** Request from pharmaceutical companies to provide significant education presentations must be arranged through the Agency Medical Director, approved by the Agency Director in conjunction with the Education Coordinator and Pharmacy Director. This includes presentations to groups of NNAMHS employees, presentations involving scientific content or a speaker, instructional or training presentations, or significant interactions with clinicians which are expected to **last more than 20 minutes**.

1. A request must be submitted in writing to the Pharmacy Director
2. Prior to any scheduled presentation:
  - a. All inpatient presentations longer than 20 minutes must be approved by the Medical Director, the Pharmacy Director and Agency Director.
  - b. All Outpatient Presentations longer than 20 minutes must be approved by the Pharmacy Director, the Outpatient Medical Director and the Outpatient Community Services Director.

**B. For minor on-campus activities:** It is understood that a certain amount of interaction on-campus with pharmaceutical representatives is both necessary and desirable for many clinicians as it assists their highly skilled and complex prescribing activities. Therefore, interactions if of a brief and instructional nature shall not be limited in advance by the agency. However, all such interactions must conform to the PhRMA Code on Interactions with Healthcare Professionals.

1. If any activity meets the requirements of A, above, it shall go through the approval process as described.

2. Any activity which involves the bringing of meals to employees on campus must be verbally pre-approved by the relevant department manager or supervisor.
  3. The Pharmacy Director should be aware and informed of all events occurring on campus via email distribution, but only events greater than 20 minutes or of a more formal nature would need the Pharmacy Director approval.
- C. **Off-campus Activities:** Interactions between clinicians and pharmaceutical representatives during off-campus lunches on the employee's time and after regular shift hours will not be regulated by this policy. However, any time spent with pharmaceutical representatives shall either be considered as the clinician's personal time, or if paid time to be appropriately considered part of the clinician's work duties. Significant income of over \$100.00 must reported according to other division policies and be reviewed for possible ethical conflicts.
- D. **Medication samples** shall be provided according to industry guidelines and follow the Agency Policies and Procedures.
- E. Clinical staff shall be encouraged to discuss ethical issues regarding interactions with the pharmaceutical industry. Policy type issues which need to be addressed shall first be addressed by the Pharmacy and Therapeutics Committee.
- F. All major events and presentations over 20 minutes in length are presented and reviewed monthly by the Therapeutic Committee before approvals are obtained from the various department heads.